

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
DUBLIN DIVISION

FILED  
U.S. DISTRICT COURT  
AUGUSTA DIV.

2021 OCT 19 P 4:21

UNITED STATES OF AMERICA )  
 ) INFORMATION NO.  
v. )  
 ) 18 U.S.C. § 1343  
VINATH OUDOMSINE ) Wire Fraud

CLERK M. Akins  
SO. DIST. OF GA.

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this Information:

CR 321 - 013

Background

1. The Coronavirus Aid, Relief, and Economic Security ("CARES") Act was a federal law enacted in or about March 2020 designed to provide emergency financial assistance to the millions who are suffering the economic effects caused by the COVID-19 pandemic.

2. Among other relief efforts, the United States sought to provide financial support to eligible businesses that could be used to offset certain business expenses.

3. Defendant VINATH OUDOMSINE, who resided in the Dublin Division within the Southern District of Georgia, fraudulently sought and received relief funds by making false and fraudulent representations to the Small Business Administration ("SBA").

4. The SBA was an executive branch agency of the United States government that provided support to entrepreneurs and small businesses. The SBA was headquartered in Washington, DC and maintained its computer servers outside of the State of Georgia. The SBA's mission was to maintain and strengthen the

nation's economy by enabling the establishment and viability of small businesses and by assisting in the economic recovery of communities after disasters.

5. As part of this effort, the SBA enabled and provided for loans through banks, credit unions, and other lenders. These loans have government-backed guarantees. In addition, the SBA provided loans that came directly from the U.S. Government.

6. One source of relief provided by the CARES Act was the authorization for the SBA to provide Economic Injury Disaster Loans ("EIDL") to eligible small businesses experiencing substantial financial disruption due to the COVID-19 pandemic.

7. In order to obtain an EIDL, a qualifying business had to submit an online application to the SBA and provide information about its operations, such as the number of employees, gross revenues for the twelve-month period preceding the disaster, and the cost of goods the business sold in the twelve-month period preceding the disaster. In the case of EIDLs, the twelve-month period was that preceding January 31, 2020. The applicant also had to certify that all the information in its application was true and correct to the best of the applicant's knowledge.

8. EIDL applications were submitted directly to the SBA online at <https://covid19relief.sba.gov/#/> and processed by the agency with support from a government contractor, Rapid Finance. The amount of each loan was determined based, in part, on the information provided by the application about employment,

revenue, and cost of goods, as described above. Any funds issued under an EIDL were issued directly by the SBA.

9. EIDL funds could be used for payroll expenses, sick leave, production costs, and business obligations, such as debts, rent, and mortgage payments.

**COUNT ONE**  
*Wire Fraud*  
18 U.S.C. § 1343

10. The allegations of paragraphs 1 through 9 of this Information are hereby realleged and incorporated as if fully set forth herein.

11. From on or around July 14, 2020, and continuing until on or around January 8, 2021, in the Southern District of Georgia, the defendant,

**VINATH OUDOMSINE**

did knowingly devise and intend to devise a scheme and artifice to defraud, and to obtain money and property, by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice and to obtain money and property, caused interstate communications to be made over the Internet, in furtherance of the scheme and artifice to defraud, in violation of Title 18, United States Code, Section 1343.

**The Object of the Scheme**

12. It was part of the scheme that Oudomsine unjustly enriched himself by obtaining EIDL proceeds under false and misleading pretenses including by making false statements about the number of individuals his company employed and his company's gross revenue.

Manner and Means


13. It was further part of the scheme that Oudomsine submitted, or caused to be submitted, an SBA loan application on July 14, 2020 at <https://covid19relief.sba.gov/#!/> for a sole proprietorship owned by Oudomsine that had purportedly been in existence since 2018, that had ten employees, and that had twelve-month gross revenues of \$235,000. This loan application was submitted for the purpose of executing the scheme and artifice described herein, and attempting to do so, caused the be transmitted by means of wire communication from the Southern District of Georgia to a location outside the state of Georgia signals and sounds constituting an online submission of an EIDL application ending in 4221 on behalf of a business run by Vinath Oudomsine.

14. On or about August 4, 2020, in reliance on Oudomsine's false representations in his EIDL application, the SBA deposited \$85,000 into a bank account in Oudomsine's name at Bank 1.

15. In furtherance of the scheme and artifice, on or about January 8, 2021, Oudomsine used the funds obtained from SBA by means of false and fraudulent representation to purchase a Pokémon card for \$57,789.

All done in violation of Title 18, United States Code, Section 1343.

(signatures on following page)



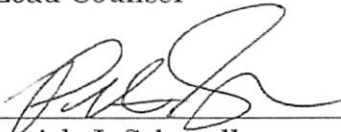
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Karl I. Knoche  
Assistant United States Attorney  
Chief, Criminal Division



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Jonathan A. Porter  
Assistant United States Attorney  
\*Lead Counsel



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Assistant United States Attorney  
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